

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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BUZZFEED, INC.,	:
	:
Plaintiff,	:
-against-	: Case No. 17-cv-07949
U.S. DEPARTMENT OF JUSTICE,	:
	:
Defendant.	:
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**PLAINTIFF BUZZFEED, INC.’S NOTICE OF
CROSS-MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law; the Declaration of Matthew L. Schafer, dated April 20, 2018, and the attachments thereto; the Declaration of Zoe Tillman, dated April 20, 2018, and the attachments thereto; and all prior papers and proceedings in this action, Plaintiff BuzzFeed, Inc. (“BuzzFeed”) moves the Court for an order denying the motion for summary judgment of Defendant U.S. Department of Justice (“DOJ”) and granting BuzzFeed’s cross-motion for summary judgment by directing DOJ to produce an unredacted copy of the Report of Investigation, as described in BuzzFeed’s Memorandum of Law. BuzzFeed further respectfully requests that the Court award it the costs of these proceedings, including reasonable attorney’s fees, as permitted by 5 U.S.C. § 552(a)(4)(E), and grant such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, pursuant to this Court’s order of March 8, 2018, DOJ’s reply and opposition to BuzzFeed’s cross-motion is due by May 18, 2018, and BuzzFeed’s reply is due by June 1, 2018.

Dated: April 20, 2018

Respectfully Submitted,

BUZZFEED, INC.

By: s/_____

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